

REMARKS

Status Of The Application

Claims 1 – 4, 7 - 48, 50 - 52 and 54 - 72 are pending. Claims 1, 2, 7-10, 14-17, 24-31 and 57, have been amended. Claims 1, 9, 16 and 17 are independent claims.

References to the outstanding Office action are indicated in parenthesis as such (Para. X).

Claim 57 stands objected to as having an incorrect status identifier. (Para. 2.)

Claims 25, 27, 29, and 31 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. (Para. 3.) More specifically, the Examiner indicates that the recitation of a media block beginning with a delta frame is not supported by the specification.

Claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,930,493 to Ottesen et al. (Ottesen) in view of U.S. Patent No. 6,539,164 to Shirakawa et al. (Shirakawa). (Para. 4, page 3.)

Claims 8 and 15 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of Shirakawa et al. as applied to claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72, and further in view of U.S. Patent No. 5,899,582 to DuLac. (Para. 4, page 9.)

Claims 18 - 23, 32, 33, 35-38, 40, and 41 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of Shirakawa et al. as applied to claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72 and further in view of U.S. Patent No. 6360234 to Jain et al. (Para. 3, page 10.)

Claims 34 and 39 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of Shirakawa et al. and Jain et al. as applied to claims 18 - 23, 32, 33, 35-38, 40, and 41 and further in view of U.S. Patent No. 6,317,885 to Fries. (Para. 3, page 12.)

Claims 42 and 43 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of to Shirakawa et al. as applied to claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72, and further in view of U.S. Patent No. 6,289,346 to Milewski et al. (Para. 3, page 13.)

Claims 58, 59, 61, 62, 64, 65, 67, and 68 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of to Shirakawa et al. as applied to claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72, and further in view of U.S. Patent No. 6094680 to Hokanson. (Para. 3, page 14.)

Claims 63 and 66 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Ottesen et al. in view of to Shirakawa et al. as applied to claims 1-4, 7, 9-14, 16, 17, 24, 26, 28, 30, 44-48, 50-52, 54-57, 60, and 69-72, and further in view of U.S. Patent No. 5,790,176 to Craig. (Para. 3, page 15.)

These rejections are respectfully submitted to be overcome by the amendments in this Response.

#### Amendments To The Claims

Responsive to the incorrect identifier for claim 57, the claim is shown herein as amended and appropriately identified.

Responsive to the rejection of claims 25, 27, 29, and 31, Applicant respectfully traverses this rejection and the Examiner's interpretation of the specification. However, for

purposes of facilitating this prosecution, these claims have been amended to overcome this rejection.

Each of independent claims 1, 9, 16 and 17 has been amended to recite *one or more sequential media blocks, each of the sequential media blocks comprising data representing a consecutive integral number of digital frames selected from the group comprising full frames and delta frames and the corresponding audio components*. This reference finds support in the specification, bottom of page 21 – top of page 22, as filed. No new matter has been added. See, particularly:

“...the media content block comprises an integral number of frames. Moreover, the frames, which may be full frames and/or delta frames are arranged such that each media content block is a viewable unit - in other words, all of the frames in the media content block may be viewed without reference to data regarding other frames.” (Applicants’ specification, page 21, line 22 – page 22, line 4.)

Dependent claims 24, 26, 28 and 30 have been amended to recite at least one of the media blocks as beginning with a viewable frame. Dependent claims 25, 27, 29 and 31 have been amended to recite each of the media blocks as viewable without reference to data regarding other frames. These amendments finds support as above, and no new matter has been added.

Other claims have been amended for consistency of language. No new matter has been added.

#### Applicant’s Arguments

As amended, the claimed invention enables the playing back of stored digital content with significant and beneficial granularity, in particular much more so than by established standards, for example the MPEG standard as discussed below. Each media block comprises an integral number of digital frames including full frames and/or delta frames. This

enables a user to flexibly chain and play media blocks in substantially any order, and to play back as small a unit as a single frame. As discussed below, this represents a significant improvement over the prior art.

The principal references applied include the Ottesen and Shirakawa references.

The Ottesen reference has been characterized both by Applicant and the Examiner and, for purposes of brevity, this discussion will not be repeated here. However, it is noted that Applicant has put forth, and the Examiner has agreed, that Ottesen fails to show or suggest each media block beginning with a whole frame. (Para. 4, pages 4-5.) Similarly, Ottesen fails to show or suggest each media block comprising an integral number of frames selected from the group comprising full frames and delta frames as recited in the currently amended claims.

In the subject Office Action, the Examiner states that "...it would have been obvious to one with ordinary skill in the art at the time the invention was made to modify each of the video segments disclosed by Ottesen to begin with a "whole frame" as taught by Shirakawa." (Para.4, page 4.) Applicant respectfully traverses this statement and conclusion, as well as any application of Shirakawa and/or the combination of the references to the amended claims. For purposes of discussion, however, this rejection is submitted to be overcome by the amendments submitted with this response.

More specifically, Shirakawa describes methods and devices for playing back information on or from a disk. Shirakawa contemplates and teaches demand or program playback of relatively large segments of content capable of being stored as groups of pictures (i.e. GOPs). See, for example, Shirakawa Column 24, lines 21-37:

Next, the operations will be described. A collection of a plurality of input images are referred to as a GOP (group of pictures). Each GOP includes the following; an I picture 104 intra-frame coded, P pictures 105 inter-frame coded by

forward motion compensation, and B pictures 106 inter-frame coded by forward and backward motion compensation. Input image information composed of a succession of GOPs 102 is high-efficiency coded. A GOP header 103 representing information required for decoding the GOP 102 is appended to the coded data representing the GOP. A collection of the GOPs 102 is referred to as a sequence. A sequence header 101 describing information representing, for example, a screen size of the sequence may be appended to the start of the sequence. Coded data consisting of these data items is recorded on a video disk on which addresses are assigned to areas.

As is known in the art, under the MPEG standard, GOPs typically comprise a sequence of I, P, B frames plus the frame sequence information. This sequence of different frame types is called the Group of Pictures (GOP) structure, the structure taught by Shirakawa. One common structure is 15 frames long, and has the sequence I\_BB\_P\_BB\_P\_BB\_P\_BB\_P\_BB\_. Numerous other frame structures are known. However, Applicant believes all MPEG standards to require the starting of a GOP with an "I" full frame. The portions of the Shirakawa reference cited by the examiner describe the processing of these I, P and B pictures during image retrieval.

As noted above, Applicant's claimed invention teaches and recites sequential media blocks each comprising a consecutive integral number of digital frames selected from the group comprising full frames and delta frames. Thus, Applicants' invention does not require the first frame to be an "I" frame as per the MPEG format. Neither is Applicants' invention limited to the playback of MPEG GOPs, including multiple frames, as taught by Shirakawa. Applicant's invention does not require the use of MPEG GOP construct. In contrast, Applicant's claimed invention enables the playback of as little as a single frame, to sub-media blocks of frames, to a media block(s) of frames. Applicant's invention overcomes the limiting MPEG GOP sequencing information requirements of Shirakawa, enabling more flexible and granular playback, including the ability to playback single frames as well as non-sequential, arbitrary ordered frames. These

features and advantages of Applicant's invention, not shown or suggested by the art of record, provides substantial benefits over any consideration or combination of Ottesen and Shirakawa.

Thus, Applicant's claimed invention not only distinguishes technically over the combination of Ottesen and Shirakawa, but provides the significant advantages described above.

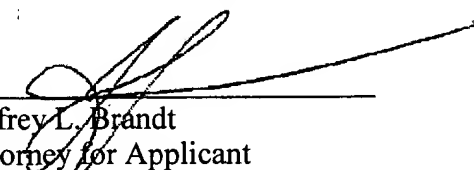
The pending dependent claims are respectfully submitted to be patentable as depending from patentable independent claims. However, Applicant specifically reserves the right to argue and pursue each dependent claim in its own right. More particularly, Applicants note the limitations recited in claims 24, 26, 28 and 30 as to the first frame of a media block comprising a viewable frame, and the limitations recited in claims 25, 27, 29 and 31 as to each media block viewable without reference to data regarding other frames, and submit these dependent claims to be nowhere shown or suggested in the prior art of record.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and the allowance of the present application.

Applicant's undersigned attorney may be reached by telephone at (203) 438-1077.

All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



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